

KOBRE & KIM LLP

800 THIRD AVENUE
NEW YORK, NEW YORK 10022
WWW.KOBREKIM.COM

TEL +1 212 488 1200
FAX +1 212 488 1220

NEW YORK
LONDON
HONG KONG
SEOUL
WASHINGTON DC
SAN FRANCISCO
MIAMI
CAYMAN ISLANDS
BVI

December 16, 2015

BY EMAIL

Hon. Thomas P. Griesa
United States Courthouse
500 Pearl Street
New York, NY 1007-1312

Re: *United States v. Prevezon Holdings, Ltd., et. al.*, 13 Civ. 6326 (TPG)

Dear Judge Griesa:

We are counsel to non-party William Browder. We write to correct inaccurate and misleading statements in the letter Baker Hostetler sent the Court today. The contempt motions regarding Mr. Browder that Baker Hostetler filed last week contained similar misstatements, which we were unable to correct prior to the Court's denial of those motions because we received no notice of those motions from Defendants.

Baker & Hostetler's statements that Mr. Browder has been uncooperative in scheduling his deposition or generally unavailable to appear for it are inaccurate and misleading. Contrary to Baker Hostetler's representations to the Court, to date Mr. Browder has provided 8 dates for which he could be available for deposition. 009 These include November 27, December 7, December 18, December 28, December 29, December 30, January 4 and January 5. We have attached relevant correspondence proposing these dates. Baker Hostetler rejected many of these dates for its own scheduling reasons.

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We regret that the Court's already busy docket is being burdened with this type of correspondence.

Respectfully submitted,

/s/

Michael S. Kim
+1 212 488 1201

Encl.
cc: Counsel of Record